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September 29, 1992

Mr. Frazer Lockhart U.S Department of Energy Rocky Flats Plant Building 116 P. O. Box 928 Golden, Colorado 80402-0928



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RE: FINAL, PHASE I RFI/RI WORKPLAN, ROCKY FLATS PLANT, SOLAR EVAPORATION PONDS (Operable Unit No. 4), JANUARY, 1992 as revised May, 1992.

Dear Mr. Lockhart:

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division) and the U. S. Environmental Protection Agency (EPA) have reviewed the revisions to the subject document as submitted by DOE on August 6, 1992.

The Division, as lead agency, is aware that a contract has been awarded to implement the Phase I RFI/RI investigation; however, DOE has yet to respond to our comment of May 8th regarding the need to establish a vadose zone technical memorandum delivery date. Approval of vadose zone activities must be obtained from the Division before proceeding with this portion of the work. For this reason, the Division is unable to lift the conditional status from the approval granted on May 8, 1992. Nevertheless, unaffected field work may be implemented.

The Division further notes that the RFI/RI investigation schedule, as contained in the work plan, has not been amended from that specified by the Interagency Agreement dated January 22, 1991. The Division therefore assumes, despite the lengthy delay in implementing the work plan, that the schedule for delivery of the Phase I RFI/RI Report will be maintained.

Section 3 of the work plan has not been updated to reflect the concept of Potential Chemical-Specific Benchmarks. DOE must, however, ensure that the appropriate detection levels are met by the analytical laboratories.

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If you have any questions, please call Harlen Ainscough of my staff at 692-3337.

Sincerely,

Gary W. Baughman, Chief

Facilities Section

Hazardous Waste Control Program

cc: I

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